PFAS TALKING POINTS - SOLVAY SPECIALTY POLYMERS
RCRA CORRECTIVE ACTION FACILITY, West Deptford, New Jersey
February 12, 2019

BACKGROUND:

- Solvay is a 243-acre facility situated in a mostly industrial setting, surrounded by a rural residential area and bordered to the north by the Delaware River. The hazardous waste management operations are managed under a New Jersey DEP permit for on-site hazardous waste storage and incineration.
- Solvay used the telomer-based fluorosurfactant (known as Surflon S-111) and sodium perfluorooctanoate, which contain chemical compounds belonging to PFAS, as a processing aid in its manufacturing processes until 2010. Surflon S-111 was used from 1985 to 2010. Sodium perfluorooctanoate was also used from 1995 to 2003. Solvay voluntarily joined the EPA 2010 / 2015 PFOA Stewardship Program in 2006, and it's our understanding that by 2010 Solvay phased out the use of PFAS at the facility.
- Delaware River surface water samples collected for PFAS by the Delaware River Basin Commission in 2007-2009 showed elevated levels of PFNA and others. In addition, NJDEP performed sampling for PFAS in selected Gloucester County public water systems in 2009 and in 2013. Elevated levels of PFNA and others were also detected.
- Solvay performed investigations in 2014 on surface water/sediment, on-site/off-site groundwater, public water systems, and private wells and also conducted air dispersion and deposition modeling. The results showed that PFNA and PFOA, among the PFAS analyzed, were the contaminants of concern in groundwater, the public water systems and private wells. PFNA and PFOA were detected in groundwater above the applicable state interim specific groundwater criterion (10 parts per trillion or ppt for PFNA) and state health guideline (40 ppt for PFOA).
- Similar PFAS compounds were also detected in surface water and sediment.

KEY POINTS:

- <u>Public Water Systems</u>: Beginning in 2014, Solvay performed a year of sampling of water at seven public water supplies in Gloucester County on a quarterly basis. PFNA and PFOA, among the PFAS analyzed, were the constituents of concern. In response, appropriate response actions (e.g., providing bottled water to residents, not using wells with elevated PFAS levels as drinking water sources) were taken to prevent unacceptable human exposure. For the Borough of Paulsboro's public water supply, in May 2016, Solvay installed a carbon treatment system for Paulsboro's Well 7 which had elevated concentrations of PFNA.
- <u>Site Groundwater Investigation</u> - PFNA was detected at on-site wells (as high as 482,000 ppt) and off-site wells (as high as 2,700 ppt for an off-site well approximately 1 mile downgradient from the facility boundary). In May 2018, Solvay submitted plans which propose to supplement the ongoing on-site pumping and treatment system to address off-site groundwater contaminated with VOCs. In 2019, Solvay is expected to begin implementation of an off-site groundwater pump and treat system for VOCs. The ongoing on-site and future off-site groundwater treatment systems are also expected to recover PFAS to some extent.
- <u>Private Potable Well Sampling</u> - Solvay performed private well sampling between May – December 2014. Solvay provided bottled water to those residences whose wells showed PFNA

and PFOA above their respective standard and guideline. Solvay sampled a total of 96 potable wells until September 2015. Under the NJDEP Publicly Funded Program, 245 private wells were sampled, and 46 locations have POETs installed. NJDEP connected 3 homes to a municipal water line and have plans to connect additional 12 locations which currently have POETs.

TALKING POINTS:

- NJDEP is the lead for the oversight of Solvay's corrective action activities under its site remediation program, including PFAS-related mitigation and cleanup activities on- and off-site. EPA, with NJDEP, has met with Solvay to discuss the PFAS investigation, mitigation and cleanup efforts. EPA also reviews and comments on Solvay's PFAS investigation work plans and reports.
- Solvay has been performing on- and off-site investigations to determine the nature and extent of PFAS contamination, particularly PFNA and PFOA. Solvay was cooperative in investigating and mitigating impacts of PFAS to nearby public water systems and affected communities.
- NJDEP is continuing to perform off-site investigations to assess and mitigate impacts of PFAS to private potable wells suspected to be impacted by Solvay's past operations.